



Department of Energy

**Ohio Field Office
Fernald Area Office**

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JAN 29 1998

DOE-0350-98



**Mr. James A. Saric, Remedial Project Manager
U.S. Environmental Protection Agency
Region V-SRF-5J
77 West Jackson Boulevard
Chicago, Illinois 60604-3590**

**Mr. Tom Schneider, Project Manager
Ohio Environmental Protection Agency
401 East 5th Street
Dayton, Ohio 45402-2911**

Dear Mr. Saric and Mr. Schneider:

**RESPONSES TO OHIO ENVIRONMENTAL PROTECTION AGENCY COMMENTS ON THE
PADDYS RUN EMBANKMENT STABILIZATION WORK PLAN AND DESIGN**

**Reference: Letter, Schneider to Reising, "DOE FEMP Conditional Approval: Paddys Run
Embankment Stabilization Work Plan and Design," dated December 18, 1997.**

The purpose of this letter is to transmit responses to the Ohio Environmental Protection Agency's (OEPA) comments on the Paddys Run Embankment Stabilization Work Plan and Design. These comment responses were discussed with you during our meeting on January 9, 1998. Your input from that meeting has been incorporated into the comment responses and associated actions.

If you have further questions or comments on responses, please contact Kathleen Nickel at (513) 648-3124.

Sincerely,

**Johnny W. Reising
Fernald Remedial Action
Project Manager**

FEMP:Nickel

Enclosure: As Stated

cc w/enc:

N. Hallein, EM-42/CLOV
G. Jablonowski, USEPA-V, 5HRE-8J
R. Beaumier, TPSS/DERR, OEPA-Columbus
T. Schneider, OEPA-Dayton (Total of 3 copies of enc.)
F. Bell, ATSDR
D. Ward, HSI GeoTrans
R. Vandegrift, ODOH
F. Barker, Tetra Tech
D. Carr, FDF/52-5
J. D. Chiou, FDF/52-5
T. Hagen, FDF/65-2
J. Harmon, FDF/90
T. Klimek, FDF/52-5
P. Riley, FDF/52-5
AR Coordinator/78

cc w/o enc:

A. Tanner, DOE-FEMP
R. Heck, FDF/2
S. Hinnefeld, FDF/2
EDC, FDF 52-7

Action: No action required.

Commenting Organization: Ohio EPA
 Section #: 1.3.3 Pg #: 1-6 Line #: 1-6 Commentor: DSW
 Original Comment #: 3 Code: C

Comment: The fence should be moved back at least 25 feet from the stream bank to allow the establishment of riparian vegetation.

Response: Agreed.

Action: The fence will be repositioned to provide adequate setback.

Commenting Organization: Ohio EPA
 Section #: 1.3.3 Pg #: 1-6 Line#: 15 Commentor: DSW
 Original Comment #: 4 Code: C

Comment: The text refers to the current condition the east bank of Paddys Run as being the result of natural erosion however the erosion of the east bank has been caused by modifications to the drainage of Paddys Run by the site. It is unknown whether this erosion would have ever occurred naturally. The specific modifications by the site include the diversion of the drainage from the north section of the site which used to enter Paddys Run just upstream of the current east bank erosion. This drainage was diverted into Paddys Run upstream of the railroad track during the construction of the waste pits. Paddys Run was also moved during the construction of the waste pits. These two actions have contributed to the forces impacting upon and eroding the east bank of Paddys Run in the vicinity of the silos.

Response: Understood. The term "natural erosion" used in the work plan was used in the context of the stream's current alignment.

Action: No action required.

Commenting Organization: Ohio EPA
 Section #: 1.3.4 Pg #: 2.2 Line #: 1-7 Commentor: DSW
 Original Comment #: 5 Code: C

Comment: It should be noted that all gravel will be removed from the road at the end of the remediation activities. Additionally it should be noted that the placement of the riprap in the stream bed is a temporary measures to provide support to the stream bank for remediation of the silos and will be removed at the end of the silo remediation.

Response: There is currently no intent to remove the gravel road under the scope of this project. Gravel used to construct the access road will remain in place to support Remediation Areas 7 and 8 as needed. Removal of the gravel road, as well as riprap placed in the stream bed, will be evaluated in the Area 7 and/or Area 8 designs.

Action: No action required.

Commenting Organization: Ohio EPA
Section #: 1.3.4 Pg #: 2-3
Original Comment #: 6

Commentor: DSW
Line #: 25-29 Code: C

Comment: The maximum slope of the stockpile should be here. The slope should not exceed the ability of the soil to establish vegetation without slippage and should minimize velocity of flow down the slope sides to minimize erosion of the unprotected soils.

Response: Agreed. Stockpiles of soil excavated during this project will have maximum side slope of 2:1 (2 horizontal to 1 vertical).

Action: If a stockpile is needed, side slope requirements will be communicated to the construction crew.

Commenting Organization: Ohio EPA
Section #: 1.3.4 Pg #: general
Original Comment #: 7

Commentor: DSW
Line #: Code: C

Comment: It should be noted that no equipment should be left in the 25-year flood plain when heavy rains are anticipated or when there will be no one present to remove the equipment in the case of unanticipated rain events. Paddys Run tends to rise very quickly in the case of a rain event.

Response: Agreed. The site Meteorologist has been notified to contact the project's Construction Coordinator prior to a significant rain event.

Action: No action required.